

200 Old Country Road, Suite 400, Mineola, New York 11501 T: (516) 873-3000 F: (516) 873-9032

February 24, 2022

VIA ECF

United States District Court Western District of New York 100 State Street Rochester, New York 14614

Attention: The Honorable Judge David G. Larimer

RE: Van Bortel, et al v. Ford Motor Company

Case Number: 21-cv-06739 (DGL)

Dear Justice Larimer,

This office represents Mary Catherine Van Bortel a/k/a Kitty Van Bortel and Howard G. Van Bortel, the plaintiffs in the above-referenced matter. Please permit this to serve as a joint correspondence on behalf of both parties.

This matter was removed to this Court on December 13, 2021 (Docket #1), and Defendant's time to respond to the Amended Complaint was extended, on consent, to February 3, 2022 (Docket #5). Thereafter, Counsel for Ford filed a Pre-Answer motion to dismiss (Docket #8). The Parties, on consent of all counsel, respectfully request to revise the current briefing schedule for said motion, as follows:

- a) Plaintiffs' opposition to be filed by March 14, 2022; and
- b) Defendant's Reply Brief to be filed by March 28, 2022.

Counsel for Ford also respectfully requests oral argument on a date to be set by the Court.

Please let us know if you have any questions or concerns. Thank you for your kind attention to this matter.

Respectfully submitted,

Steven Blotton

Steven H. Blatt, Esq.

CC: VIA ECF

Aaronson Rappaport Feinstein & Deutsch, LLP

600 Third Avenue, 5th Floor New York, New York 10016